EXHIBIT 48

IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF MISSISSIPPI Oxford Division

JOHN RASH,)
Plaintiff,) No. 3:20-cv-224-NBB-RP
v. LAFAYETTE COUNTY, MISSISSIPPI,)))) DECLARATION OF JOE YORK)
Defendant.)

I, JOE YORK, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

- 1. My name is Joe York. I am a documentary filmmaker and freelance producer/director/editor. I live in Water Valley, Mississippi, which is about 20 miles or a 30-minute drive from Oxford, Mississippi. From 2005 to 2015, I worked as a documentary filmmaker at the University of Mississippi's Southern Documentary Project and the Southern Foodways Alliance, both located in Oxford, MS. Over that decade, I produced over 50 short films and four feature length films focused on the culture, food, music, history, and social issues of the American South. In 2015, I left my position at the University of Mississippi to pursue a career as a freelance producer and director.
- Counsel for John Rash hired me in the above-referenced lawsuit to take photos and video
 of the Lafayette County Courthouse (the "Courthouse") and the Oxford Courthouse
 Square (the "Square"), both located in Oxford, Mississippi.
- 3. On January 14, 2021, I took photographs and video, both from the ground and from the air via a drone, of the Courthouse and the Square. I took these photographs and video on four occasions on January 14, 2021: (i) aerial photos and video on or around 3:30pm to 4:30pm, (ii) ground photography on or around 4:30pm to 5:00pm; (iii) aerial photos and

video during civil twilight, which is the 30 minutes directly following sunset, which on this day was on or around 5:00pm to 5:30pm; and (iv) ground photography on or around 5:30pm to 6:00pm.

- 4. These photographs and video are true, fair and accurate representations of the Courthouse and the Square. Attached hereto is Exhibit A, which describes the photographs and video in detail.
- 5. True and correct copies of the above-described photographs were produced in the above referenced action via Bates Numbers RASH_2656 to 2720. True and correct copies of the above-described videos were produced in the above referenced action via Bates Numbers RASH_2721 to 2722.

I declare under penalty of perjury that the statements above and in Exhibit A are true and correct.

Joe York

Date

Exhibit A

The aerial, still photos were taken via drone of the Square and Courthouse during the day, as the sun set, and shortly after sunset.

The two, aerial videos were taken from a drone and depict a complete circuit of the Square. I used an intelligent flight mode on my drone in which I inputted the Courthouse as a point of interest and had the drone do a 360-degree flight around the Courthouse. The resulting video depicts the entirety of the Square with the Courthouse as the central point of interest. The daylight video was taken on or around 4:00pm, and the other video was taken on or around 5:25pm.

The still photos from the ground include the following:

- The Courthouse, its grounds and surrounding buildings on the Square, including City Hall, which is on the North East corner of the Square, Square Books, which is on the South side of the Square, Off Square Books, which is on the South East part of the Square, and Tangos, which is one block North West of the Square.
- I took a photo in front of Nelson's Department Store, which is on the East side of the Square. This photo captures the East sidewalk of the Square and the Courthouse.
- The photos of the Courthouse grounds depicting the flag poles and the historical marker are the north lawn.
- The south lawn of the Courthouse grounds includes the confederate monument.

Through my photos and videos of the Square and Courthouse, I captured the Courthouse grounds and the commercial area of the Square from all sides.